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February 16, 2023

Via CM/ECF System

The Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street, Room 2220
New York, NY 10007

Re: Request to Adjourn Initial Pretrial Conference
Travelers v. Cohesion Freight (HK) Ltd., et ano.
SDNY Case No. 23-cv-334 (LAP) (JLC)
Related SDNY Case No. 23-cv-331 (LAP) (JLC)

Dear Judge Preska:

We represent Plaintiff Travelers Property Casualty Company of America in the above-referenced actions, both of which concern the stow collapse and subsequent overboard loss of various shipping containers from the M/V MADRID BRIDGE in January 2022 (Dkt. #3).

Pursuant to section 1.E of Your Honor's individual rules, we write jointly with counsel for Defendant Cohesion Freight (HK) Limited to request that the initial pretrial conference in case no. 23-cv-334, currently scheduled for Thursday February 23, 2023 at 2:00 p.m. (Dkt. #13), be adjourned. Although Defendant Yang Ming Marine Transport Corp. has not yet appeared or answered, it recently executed a waiver of service (Dkt. #14) and consents to the adjournment request. No other adjournment requests have been made in this action. (Also, to date, the Court has not scheduled an initial pretrial conference in case no. 23-cv-331.)

Given the likelihood that other actions concerning the same maritime casualty (and involving some of the same parties and counsel) will be filed in this District in the next few weeks and marked as related to these cases, we respectfully submit that both the Court and

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parties would benefit from conducting a single omnibus conference at a later date—as well as the entry of a unified scheduling order and case management plan. We also note that Judge Hellerstein and Judge McMahon have taken a similar approach by consolidating for pretrial purposes numerous related cases arising from other maritime casualties. *See* 21-cv-8048-AKH (In re: MAERSK EINDHOVEN Voyage 103N Shipper Cases); 21-cv-8183-CM (In re: MAERSK ESSEN Voyage 051 Shipper Cases).

We thank the Court for its consideration of the foregoing and stand ready to answer any questions that the Court may have regarding the parties' adjournment request.

Respectfully submitted,
HILL RIVKINS LLP



Justin M. Heilig

Cc: Timothy J. Nast, Counsel of Record for Cohesion Freight (via ECF)

Norman Choi, General Counsel for Yang Ming (via Email)

The initial pretrial conference is adjourned. The parties shall appear for an initial pretrial conference via telephone on March 23, 2023 at 10:00 AM. The dial-in for the conference is (877) 402-9753, access code 6545179.

SO ORDERED.



2/17/23